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LAW FIRM

Robert B. Wiygul
Partner

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August 5, 2019

Katherine Collier, Executive Secretary
Mississippi Public Service Commission
501 N. West Street, Suite 201A
Jackson, MS 39201

FILED
AUG 05 2019
MISS. PUBLIC SERVICE
COMMISSION

Re: Docket No. 2019-UA-116
Petition of Mississippi Power Company for a Certificate of Public
Convenience and Necessity for Environmental Compliance Activities
Authorizing the Closure of the Ash Pond, Construction of Low Volume
Wastewater Treatment Facilities, and Conversion of Bottom Ash
Collection Facilities for the Plant Victor J. Daniel Electric Generating
Facility in Jackson County Mississippi

Dear Ms. Collier:

Enclosed please find the original and twelve (12) copies of the Sierra Club's Motion for Intervene in the above referenced matter. For your convenience, I have enclosed a self-addressed envelope and a copy of the first page of the Motion, which I would appreciate your file stamping and returning to me.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Robert B. Wiygul

RBW/mn

cc: All parties of record (by electronic or U.S. mail)

FILED

AUG 05 2019

**MISS. PUBLIC SERVICE
COMMISSION**

2019-UA-116

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

MISSISSIPPI PUBLIC SERVICE COMMISSION

IN RE: PETITION OF MISSISSIPPI POWER COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR ENVIRONMENTAL COMPLIANCE ACTIVITIES AUTHORIZING THE CLOSURE OF THE ASH POND, CONSTRUCTION OF LOW VOLUME WASTEWATER TREATMENT FACILITIES, AND CONVERSION OF BOTTOM ASH COLLECTION FACILITIES FOR THE PLANT VICTOR J. DANIEL ELECTRIC GENERATING FACILITY IN JACKSON COUNTY MISSISSIPPI

MOTION TO INTERVENE

COMES NOW the Sierra Club and hereby files this Motion to Intervene in the above-styled proceeding. In support thereof, the Sierra Club states as follows:

1. The Sierra Club is a 501(c)(4) nonprofit corporation. The Mississippi chapter of the Sierra Club is a division of the Sierra Club with headquarters located at 921 North Congress Street, Jackson, Mississippi 39202.
2. The Sierra Club represents approximately 1700 members statewide with substantial interests in energy policy, control of the negative externalities associated with energy sources, minimizing negative impacts to the environment, and insuring that ratepayers do not pay for poor choices by utilities. These interests specifically include appropriate management of coal ash and other waste associated with Mississippi Power Company's interest in Plant Daniel.
3. The names and addresses of the attorneys who are authorized to accept service of filings on behalf of the Sierra Club in this proceeding are:

Robert B. Wiygul
Waltzer Wiygul & Garside
1011 Iberville Drive
Ocean Springs, MS 39564
Tel: (228) 872-1125
Fax: (228) 872-1128

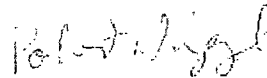
4. The Sierra Club requests intervention as a full party record, including the right to present testimony and exhibits and to cross-examine witnesses. The Sierra Club's rights and interests in this matter will not adequately be represented by any other party, and its participation will not unduly delay these proceedings.

5. The Commission issued its notice of this docket on July 16, 2019. This application for intervention is therefore timely under the Commission's rules and practices and the terms of the order.

WHEREFORE, the Sierra Club respectfully requests that the Commission enter an Order granting this Motion and allowing the Sierra Club to become a full party of record in the above-styled proceeding.

Respectfully submitted this 5th day of August, 2019.

Respectfully submitted,
Mississippi Chapter Sierra Club



By:

Robert B. Wiygul
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CERTIFICATE OF SERVICE

I, Robert B. Wiygul, counsel for Sierra Club do hereby certify that in compliance with RP6.122(2) of the Commission's Public Utilities Rules of Practice and Procedure (the "Rules").

(1) An original and twelve (12) true and correct copies of the filing have been filed with the Commission by United States Postal Service this date to:

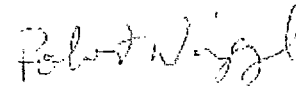
Katherine Collier, Executive Secretary
Mississippi Public Service Commission
501 N. West Street, Suite 201-A
Jackson, MS 39201

(2) An electronic copy of the filing has been filed with the Commission via e-mail to the following address: efile.psc@psc.state.ms.us

(3) An electronic copy of the filing has been served via e-mail to the following address:

frank.farmer@psc.state.ms.us
chad.reynolds@psc.state.ms.us
virden.jones@psc.state.ms.us
rcox@balch.com
ssshurde@southernco.com
sjackson@cooperativeenergy.com

This the 5th day of August, 2019.



Robert B. Wiygul (MS Bar #7348)
Waltzer Wiygul & Garside
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